

Dear Leon Valley City Council, as qualified electors of the City of Leon Valley, we, the undersigned, demand the removal of Leon Valley City Council Member, Donna Charles, and demand that the City Council to order and hold an election to determine where such officer shall be removed from office by recall pursuant to Article VI of the Home Rule Charter.

The grounds for removal, including the alleged action(s) and factual circumstance(s) surrounding such action(s) are:

1. Abdicating responsibilities of constituent services by failing to allow "Citizens to be Heard" during the special council meetings on July 2-3, 2019; July 18-19, 2019; August 8-9, 2019; August 13-14, 2019 AND voting to shorten, place excessive limitations, and censor constituents voices during "Citizens to be Heard" as evidenced by passage of the "Rules of Conduct and Decorum for Public Meetings" on September 17, 2019.
2. Voting to continue allow, via definitions of "junked vehicle" in Section 8.08.001 of the Leon Valley Code of Ordinances, police to continue overly zealous practice of towing motor vehicles with expired registrations only, including vehicles contained on private property. This was evidenced by councilmember Charles's vote to leave things "as-is" despite Councilor Bradshaw pointing out the inconsistencies with Leon Valley ordinances and Texas Law in the council meeting on June 18, 2019.
3. Malfeasance during the administrative hearing of Councilor Benny Martinez, including poor application of Leon Valley Home Rule Charter regarding allegations against accused council member; inability to differentiate what evidence should be considered subjective versus objective and thus, disregarded; improperly displaying partiality, and improperly allowing bias to dictate decision making, as evidenced by dialogue during deliberations on August 14, 2019 council meeting.
4. Failure to vote and appoint unbiased, disinterested, and qualified, "Designated Officer" in accordance with Section 1.04.006 of the Leon Valley Code of Ordinances, Section (1)(A)(2) during the months of April, May, June, July, or August 2019, deemed necessary to "promote neutrality in the process" of the formal 3-12 administrative hearing.
5. Defiance of citizens' ability to participate in fair democratic process as well as violation of Home Rule Charter Section 3.08 (E)(4) and Section 3.09 (E) by attempting to forfeit the seat of the duly elected official with only a total of three (3) members of City Council allowed to vote, with blatant disregard of the requirement that 2/3 vote of City Council must vote to forfeit the seat of a council member. The Leon Valley Home Rule Charter approved by voters of Leon Valley in 2017 defines City Council as five council members and a mayor--- contrary to the word crafting of "those who may deliberate and vote" intentionally placed into the ordinance containing the 3-12 procedures by the biased legal counsel retained by the City Manager. This was evidenced by the vote for forfeiture on August 14, 2019 council meeting and evidenced by vote on meeting of August 20, 2019 in which the vote was made for a non-duly elected official to take over Leon Valley Council Seat 4.
6. Spending over \$100,000 of taxpayer money and wasting thousands of hours of city staff, employee, and official's time in effort to cancel the votes of the citizens of Leon Valley, as evidenced by financial reports from agenda packets for council meetings in 2019, Attorney Ryan Henry's billing statements, content presented and discussed at 2019 special council meetings, and staff/ employee/ official presence at 2019 special council meetings.

Signature	Printed Name	DOB or Voter ID #	Residence Address	Date Signed
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**STATE OF TEXAS
COUNTY OF BEXAR**

I, _____, being first duly sworn, on oath depose and say that I am one of the signers of the above petition, and that the statements made therein are true, and that each signature appearing thereto was made in my presence on the day and date it purports to have been made, and I solemnly swear that the same is the genuine signature of the person it purports to be.

Signature _____

Sworn and subscribed before me this _____ day of _____, 20_____.

NOTARY PUBLIC, STATE OF TEXAS

My commission expires: _____